

# **EXHIBIT 301**

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

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<b>DONNA CURLING, et al.</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>CIVIL ACTION FILE NO.: 1:17-</b>
<b>vs.</b>	)	<b>cv-2989-AT</b>
	)	
<b>BRAD RAFFENSPERGER, et al.</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

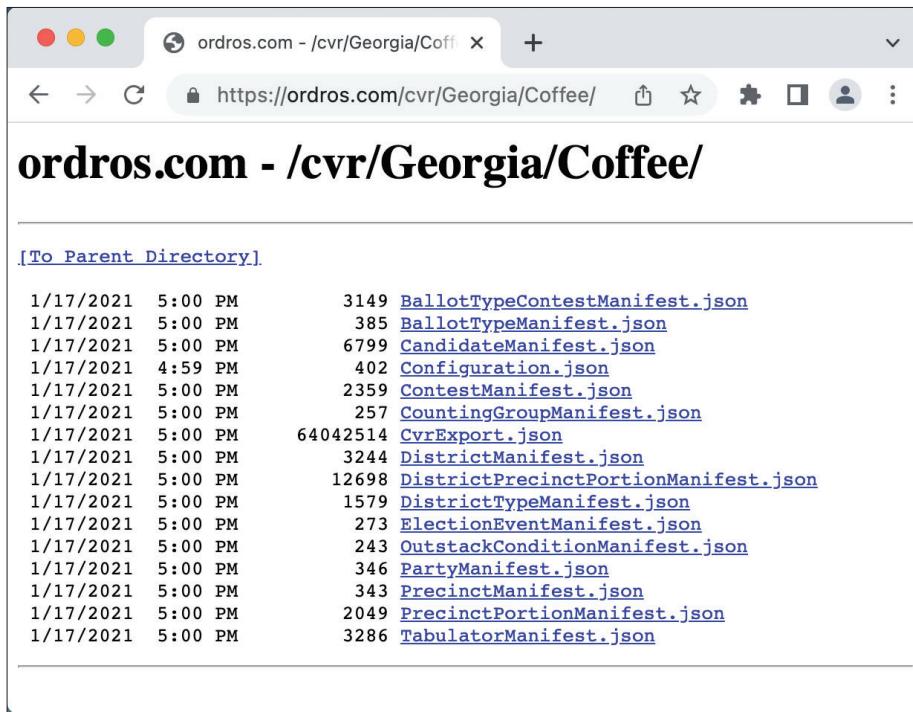
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**SUPPLEMENTAL DECLARATION OF KEVIN SKOGLUND**

**KEVIN SKOGLUND** declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I hereby incorporate my previous declarations as if fully stated herein. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.
2. Plaintiffs asked for my expert opinion on the authenticity and provenance of files hosted at <https://ordros.com/cvr/Georgia/Coffee/> (“hosted files”) which purport to include Cast Vote Records (“CVRs”) from the November 2020 General Election in Coffee County, Georgia.

3. CVRs are a collection of data which show how a tabulator interpreted each ballot. In essence, they hold a digital record of votes cast in an election.
4. This is a screenshot of the hosted files taken by me on July 27, 2022.



5. There is significant evidence that the hosted files are authentic records from the November 2020 General Election in Coffee County.
6. The Dominion Democracy Suite Election Management System (“EMS”) includes the Results Tally & Reporting (“RTR”) software application. RTR opens an election project file—which defines the parameters for the election, precincts, tabulators, contests, candidates, and ballots—and

17. It is my opinion that the available evidence establishes that the hosted files are authentic records from the November 2020 General Election in Coffee County. I am aware of no evidence that they are not.

18. The hosted files list an upload/creation date of January 17, 2021. If the listed date is correct, then the hosted files were exported sometime between November 3, 2020 and January 17, 2021.

19. To my knowledge, CVR exports like the hosted files can only be generated using the Democracy Suite EMS and RTR software and only with the relevant election project file after the results from the tabulators have been imported.

20. Therefore, I conclude that the hosted files were exported either:

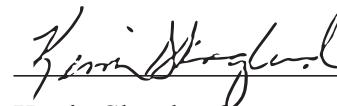
- a. while the EMS server was in Coffee County's possession,
- b. after the EMS server was removed from Coffee County's possession, which was represented to the court as occurring on June 8, 2021 (and which would conflict with the listed upload/creation date for the files),
- c. by someone with access to a copy of the EMS RTR software and a copy of the election project file for the November 2020 General Election after the results from the tabulators had been imported.

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21. *The Washington Post* and *The Daily Beast* reported that a group travelled to Coffee County on or around January 7, 2021 with the intention of copying Coffee County's EMS server.<sup>1</sup>

22. It is possible that someone in this group exported the hosted files while in Coffee County, or that someone—in or out of this group—exported the hosted files afterwards using a copy of the EMS server.

Executed on this date, July 27, 2022.



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Kevin Skoglund

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<sup>1</sup> <https://www.washingtonpost.com/investigations/2022/05/13/coffee-county-misty-hampton-election/>  
<https://www.thedailybeast.com/how-a-coffee-county-gop-chair-coordinated-a-voting-machine-breach/>  
<https://www.washingtonpost.com/investigations/2022/06/12/coffee-county-georgia-dominion-breach/>